

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Clifton Scott Campbell,

Court File No.

Plaintiff,

vs.

**NOTICE OF REMOVAL
PURSUANT TO 28 U.S.C. 1446(a)**

The City of Duluth; Officer Joshua Kneeland, *in his individual capacity*; Officer Amy Lemenager, *in her individual capacity*; Sara Schutte, *in her individual capacity*; Officer Jayson Dardis, *in his individual capacity*; Officer Anderson, *in their individual capacity*; and Former Chief Mike Tusken, *in his individual capacity*,

Defendants.

TO: The United States District Court for the District of Minnesota.

Defendants Officers Joshua Kneeland, Amy Lemenager, and Sara Schutte, through their attorneys, Stephanie A. Angolkar, Ashley M. Ramstad, and Carlos B. Soto-Quezada, IVERSON REUVERS, 9321 Ensign Avenue South, Bloomington, Minnesota, 55438, hereby petition the Court for the removal of this action from the District Court of the State of Minnesota, County of St. Louis, to the United States District Court for the District of Minnesota, all pursuant to 28 U.S.C. § 1441 and § 1446. The petitioners respectfully show and assert to this honorable court:

1. That Officers Joshua Kneeland, Amy Lemenager, and Sara Schutte in the above entitled action are the defendants in a civil action brought against them in the District Court for the State of Minnesota, County of St. Louis, in a case entitled *Clifton Scott Campbell vs. The City of Duluth, et al.* Attached hereto is a true copy of Plaintiff's Complaint.

2. Officers Kneeland, Lemenager, and Schutte received requests for waivers of service dated March 20, 2025, which have been executed.

3. These Defendants believe Plaintiff has purported to assert a cause of action under federal statute 42 U.S.C. § 1983, asserting various civil rights allegations.

4. The above-entitled action could have been brought originally in Federal Court because of the federal questions which have been asserted under the original jurisdiction statute 28 U.S.C. § 1331.

5. The matter in controversy between the Plaintiff and these Defendants allegedly exceeds the sum of \$75,000, exclusive of interest and costs.

6. That contemporaneous with the filing of this notice, further notice is given to Plaintiff, counsel for the other Defendants, and to the Court Administrator, County of St. Louis, State of Minnesota, pursuant to 28 U.S.C. § 1446(d).

7. It is respectfully submitted that removal of this action is proper and that this Court has jurisdiction to adjudicate the dispute between the parties in this case.

WHEREFORE, your petitioners move that this cause proceed in this Court, the United States District Court for the District of Minnesota, as an action properly removed thereto.

Dated: April 16, 2025

s/Stephanie A. Angolark
Stephanie A. Angolark, #388336
Ashley M. Ramstad, #402446
Carlos B. Soto-Quezada, #505571
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*Attorneys for Officers Joshua Kneeland,
Amy Lemenager, and Sara Schutte*

VERIFICATION

STATE OF MINNESOTA)

:ss

COUNTY OF HENNEPIN)

Stephanie A. Angolkar, being first duly sworn upon oath, deposes and states: that she is the attorney for the above named defendants in the foregoing action, that she has read the foregoing notice and knows the contents thereof, and that the same is true of her own knowledge, except as to matters stated on information and belief and as to those matters, she believes them to be true. Stephanie A. Angolkar states that she has read Rule 11 of the Federal Rules of Civil Procedure and that this Notice of Removal is signed pursuant to said Rule 11.

By s/Stephanie A. Angolkar
Stephanie A. Angolkar, #388336

Subscribed and sworn to before
me this 16th day of April, 2025.

s/Rebecca J. Eitreim

Notary Public

My Commission Expires: 1/31/2030